

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ACCURIDE ERIE L.P., a limited partnership,

Plaintiff/Counterclaim Defendant

v.

INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE, AND
AGRICULTURAL IMPLEMENT WORKERS
OF AMERICA, LOCAL 1186, a voluntary
unincorporated association,

Defendant/Counterclaim Plaintiff.

Case No. 05-CV-169 Erie

Judge Sean J. McLaughlin

[Electronically Filed]

AFFIDAVIT OF CATHERINE J. TRAFTON, ESQ.

I, Catherine J. Trafton, Esq., being duly sworn, depose and say:

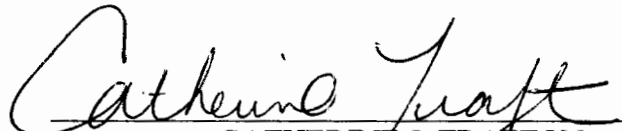
1. I am Associate General Counsel for Defendant and Counterclaim Plaintiff International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, UAW and its Local 1186 ("UAW"), and my office is located at 8000 East Jefferson Avenue, Detroit, MI 48214.

2. I have been admitted to practice to, and have been a member in good standing of, the Bar of the State of Michigan since 2001 and a member in good standing of the Bar of the State of Massachusetts since 2000. I have also been admitted to practice before the United States District Court for the Eastern District of Michigan and the United States Courts of Appeals for the Second, Sixth, Seventh, Tenth and D.C. Circuits.

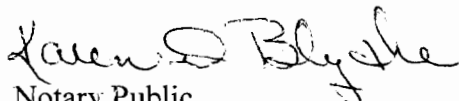
3. I am not currently suspended or disbarred by any court.

4. I am not a resident of the Commonwealth of Pennsylvania; I am not regularly employed in the Commonwealth of Pennsylvania; and, I am not regularly engaged in substantial business, professional or other activities in the Commonwealth of Pennsylvania.

5. I am familiar with this matter, and have been requested by the UAW to be actively involved in the action.


CATHERINE J. TRAFTON

SWORN to and SUBSCRIBED
before me this 3 day of
August, 2005.


Notary Public

